

**UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	BANKRUPTCY CASE NO.
	§	
BON VOYAGE INVESTMENTS, LLC,	§	11-31818-H5-11
	§	
DEBTOR	§	Chapter 11

EMERGENCY MOTION FOR AUTHORITY TO USE CASH COLLATERAL

COMES NOW BON VOYAGE INVESTMENTS, LLC, Debtor, and files this its Emergency Motion for Authority to Use Cash Collateral, and in support thereof would respectfully state as follows:

1. Movant is the Debtor and Debtor in Possession herein.
2. First National Bank and Business Financial Services, Inc. assert security interests in all of Debtor's accounts receivable and inventory to secure indebtedness owed it by Debtor.
3. Debtor needs to continue its business herein in order to be able to propose a plan of reorganization.
4. Debtor has no alternative borrowing source and to remain in business must be permitted to use its funds collected from normal business operations to pay its employees, insurance, utilities, and to pay for necessary repairs, maintenance and office expenses.
5. This motion is an emergency motion under Bankruptcy Rule 4001(b)(2). Pending a final hearing on the relief requested by this motion, the Debtor needs to use the cash collateral to avoid immediate and irreparable harm to the estate in that absent such use the Debtor would be required to cease operations.
6. The cash collateral at issue herein is in effect the funds collected from normal business operations generated monthly, with an average collateral value of approximately

\$250,000.00 per month. Debtor is requesting authorization for use of cash collateral for 14 days in the amount of \$125,000.00. Obviously, Debtor consents to giving First National Bank and Business Financial Services, Inc. replacement liens on all of their security.

WHEREFORE, premises considered, Debtor respectfully moves this Honorable Court to authorize its use of cash collateral on an emergency basis and at a final hearing, and for such other and further relief as is just.

Respectfully submitted,

/s/ Margaret M. McClure
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ATTORNEY FOR DEBTOR

BON VOYAGE INVESTMENTS, LLC

Employee Payroll	\$ 75,000.00
Payroll Taxes	6,060.00
Other Taxes	4,000.00
Inventory Purchases	74,000.00
Utilities	8,900.00
Office Expenses and Supplies	3,500.00
Repairs and Maintenance	3,500.00
Vehicle Expenses	2,500.00
Travel and Entertainment	1,800.00
Equipment Rental and Leases	4,000.00
Legal/Accounting/Other Professional Fees	1,500.00
Insurance	5,000.00
Total	\$ 189,760.00

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically mailed or mailed by first class mail, postage prepaid, this 2nd day of March, 2011 to the following:

Mr. Judy A. Robbins
U.S. Trustee
515 Rusk, 3rd Floor
Houston, Texas 77002

Mr. Mian A. Bari
Bon Voyage Investments, LLC
4502 Edison Street
Houston, Texas 77009-3338

Mr. L. David Smith
Chernosky, Ressler & Smith, PLLC
4646 Wild Indigo, Suite 110
Houston, Texas 77027

Via Facsimiles: 713-622-1026

ATTORNEY FOR FIRST NATIONAL BANK

Mace & Mack, PC
1001 West Loop South, Suite 100
Houston, Texas 77027

Via Facsimile: 713-622-0081

ATTORNEYS FOR ANNA G. PEREZ AND ANNA J. PEREZ

Mr. Norman Bhalla
Merchant Power Services
2400 Augusta, Suite 336
Houston, Texas 77057

Via Facsimile: 713-532-0510

Business Financial Services, Inc.
5852 Faringdon Place, Suite B
Raleigh, NC 27609

Via Facsimile: 866-234-8797

/s/ Margaret M. McClure
MARGARET M. MCCLURE